



## DOCUMENT RESUME

ED 105 665

88

EA 007 163

TITLE Educational Innovation and Development: An Annual Report on ESEA Title III.

INSTITUTION George Washington Univ., Washington, D. C. National Advisory Council on Supplementary Centers and Services.

SPONS AGENCY Bureau of Elementary and Secondary Education (DHEW/OE), Washington, D.C.

PUB DATE Mar 75

NOTE 24p.; Seventh Annual Report of the National Advisory Council on Supplementary Centers and Services; Tables on pages 18 and 19 may reproduce poorly

EDRS PRICE MF-\$0.76 HC-\$1.58 PLUS POSTAGE

DESCRIPTORS \*Educational Change; \*Educational Innovation; Elementary Secondary Education; \*Federal Aid; \*Federal State Relationship; \*Leadership; Organization; Program Evaluation.

IDENTIFIERS \*Elementary Secondary Education Act Title III; ESEA Title III

## ABSTRACT

This is the seventh annual report of the National Advisory Council on Supplementary Centers and Services. Title III of the Elementary and Secondary Education Act (ESEA) and the National Advisory Council will cease to exist with the implementation of the new, 1974 education amendments. In essence, Title III will be continued in Title IV of the new legislation as it is consolidated with six other programs. The emphasis of this report is on the new mandate as revealed in the legislation behind the 1974 education amendments and on 15 recommendations that address the need for organizational development and leadership on the part of the United States Congress, the United States Office of Education, the National Advisory Council on Supplementary Centers and Services, state education agencies, state advisory councils, and local education agencies. A chart presents the ESEA Title III allocations for fiscal years 1966-1975. (Author/IRT)

ED105665

U.S. DEPARTMENT OF HEALTH  
EDUCATION & WELFARE  
NATIONAL INSTITUTE OF  
EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY.

# **EDUCATIONAL INNOVATION AND DEVELOPMENT:**

## **An Annual Report on ESEA Title III**

The Seventh Annual Report of the  
National Advisory Council on Supplementary Centers and Services  
March 1975

EA 007 163

# National Advisory Council on Supplementary Centers and Services

425 13th Street, N.W. / Suite 529 / Washington, D.C. 20004 / (202) 963-3813

March 20, 1975

President Gerald R. Ford  
The White House  
Washington, D.C.

Dear Mr. President:

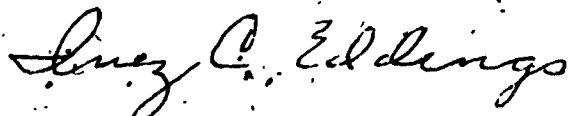
The members of the National Advisory Council on Supplementary Centers and Services are pleased to submit to you and to the Congress the Seventh Annual Report on Title III of the Elementary and Secondary Education Act.

In the report, fifteen recommendations are made which we believe will strengthen the administration and operation of Title III. These recommendations were arrived at as a result of our participation in project evaluations, our attendance at state advisory council meetings and as a result of other activities and efforts designed to strengthen the federal government's contribution to elementary and secondary education.

With the implementation of the Education Amendments of 1974, ESEA Title III will be consolidated into Title IV and the National Advisory Council will be terminated as of June 30, 1975. Prior to that time, reports on Dropout Prevention and the Nonpublic Schools and Title III Quarterlylies on The Handicapped and Educational Technology will be released. It is hoped that the annual report and the soon to be released studies and Quarterlylies will be helpful to local and state education agencies and to federal officials as they embark on the difficult task of implementing the new federal regulations and programs.

The members of the National Advisory Council have asked me to extend their appreciation for the opportunity of working with ESEA Title III. We feel that Title III has been an effective way of bringing innovation and development to classrooms and we hope that the necessary measures will be taken to continue and to strengthen this important effort.

Respectfully submitted,



Inez C. Eddings  
Chairman

Copy:

Honorable Nelson A. Rockefeller  
President of the Senate  
Washington, D.C.

Honorable Carl Albert  
Speaker of the House of Representatives  
Washington, D.C.

# National Advisory Council on Supplementary Centers and Services

## Members

Dr. Inez C. Eddings  
Chairman  
832 Kipling Drive  
Columbia, South Carolina 29205

Mrs. Martha Ayers  
Vice Chairman  
642 Locust Street  
Greenville, Illinois 62246

Mr. Arthur Ballantine  
Editor, Durango Herald  
Durango, Colorado 81301

Mrs. Teresita Dewpi  
1101 17th Street, N.W.  
Washington, D.C. 20036

Dr. William R. Harvey  
Vice President  
Tuskegee Institute  
Tuskegee, Alabama 36088

Dr. Bill L. Johnson  
P.O. Box 97  
Montezuma, New Mexico 87731

Mrs. Herlinda Chew Leong  
6177 South Southwind Drive  
Whittier, California 90601

Dr. Elsie Lestin  
2590 Atlantic Avenue  
Penfield, New York 14526

Mr. Arnold L. Norskov  
Box 187  
Albion, Nebraska 68620

Reverend Michael O'Neill, Ed.D.  
South 607 Monroe Street #4  
Spokane, Washington 99204

Mr. J. Frank Troy  
905 Secor Road  
Toledo, Ohio 43607

Mr. Joel D. Ziev  
104 Oakwood Avenue  
West Hartford, Connecticut 06119

## Staff

Gerald J. Kluempke, Executive Director  
Richard N. Frost, Assistant Director  
Polly Parker, Editorial Associate  
James A. Ruff, Research Associate  
Kathleen Maurer, Administrative Assistant  
Reggie Marchione, Secretary/Receptionist

## Dates and Places of Council Meetings during 1974

January 24-25, 1974. Council Offices,  
Suite 529, 425 13th Street, N.W.,  
Washington, D.C.

April 4, 1974. Quality Inn, 300 Army Navy Drive,  
Arlington, Virginia.

June 13-14, 1974. Council Offices,  
Suite 529, 425 13th Street, N.W.,  
Washington, D.C.

October 3-4, 1974. Washington Plaza Hotel, Fifth Avenue  
and Westlake, Seattle, Washington.

December 12-13, 1974. Council Offices,  
Suite 529, 425 13th Street, N.W.,  
Washington, D.C.

Cost of this publication was satisfied with federal funds  
from the Elementary and Secondary Education Act, Title  
III. Points of view or opinions expressed herein do not  
necessarily represent the position or policy of the U.S.  
Office of Education.

## TABLE OF CONTENTS

Introduction .....	1
Fifteen recommendations for strengthening and improving ESEA Title III and the new ESEA Title IV	
Legislation: A new Mandate The Education Amendments of 1974 .....	3
The Effect on ESEA Title III .....	4
Title IV State Advisory Councils .....	5
The Mandate .....	5
The Need for Organizational Development and Leadership .....	6
The United States Congress .....	6
The United States Office of Education .....	10
The National Advisory Council on Supplementary Centers and Services .....	13
State Education Agencies .....	14
State Advisory Councils .....	15
Local Education Agencies .....	16
A Final Thought .....	17
Allocations, ESEA Title III, 1966-1975 .....	18-19

## INTRODUCTION

This is the seventh annual report of the National Advisory Council on Supplementary Centers and Services. Title III of the Elementary and Secondary Education Act and the National Advisory Council will cease to exist with the implementation of the new education amendments to this act, P.L. 93-380. In essence, Title III will be continued in Title IV of the new legislation as it is consolidated with six other programs.

The members of this advisory council feel strongly that ESEA Title III has helped to initiate a new movement in education. That movement has introduced carefully planned and managed change into the education systems and has brought excitement to the too often dull education world and the too often dull classroom. It has given creative educators both inside and outside the classroom a means to implement their ideas, and it has given participating children opportunities that were virtually unimaginable ten years ago.

The case has been made many times that schools are failing in the terribly demanding and exceedingly important task of educating children for the world in which they live. Many school systems are educating children for the past and are, therefore, frequently outpaced by cultural, industrial and social innovations. Teacher training institutions can also be justly criticized for failing to train new teachers much differently than their colleagues were trained to teach thirty years ago. The responsibility for training and retraining these professionals must now be assumed by the schools and school districts in which they teach.

In this report, fifteen recommendations are made which we believe will lead to a strengthened and improved program. We recommend that:

### The U.S. Congress

- I. ...provide adequate funding for educational innovation and improvement and that the advance funding process be broadened to include all programs dealing with elementary and secondary education.
- III. ...encourage written and oral appropriations testimony from representatives of large and small school districts, state education agencies and state and national advisory councils.
- VI. ...take the necessary action to assure that regulations and guidelines for educational programs are promptly developed and issued.
- XII. ...increase the administrative funds authorized for the states in ESEA Title IV from 5 to 7-1/2 percent of each allotment and earmark the increase for evaluation, dissemination and diffusion of innovative and exemplary programs.

### The Assistant Secretary for Education

- IV. ...commit the necessary resources for a thorough and continuing analysis of operating education programs.
- VII. ...appoint and adequately fund a special study commission for the purposes of documenting the ten-year history of ESEA Title III, determining how effective the program has been in meeting its legislative mandate, and recommending a future course of action for the administration of the program under the provisions of the Education Amendments of 1974.

### The U.S. Commissioner of Education

- II. ...upgrade his annual report to insure that it reflects the status of American education and includes a current review of the operation of federal programs.

- V. ...continue the present national *Identification/Validation/Dissemination* effort and the *Diffusion/Adoption Strategy* and that funding for these national programs be requested from the Congress or provided through the Special Projects Act.
- X. ...the U.S. Office of Education and state education agencies develop procedures whereby nonpublic schools may initiate project proposals for submission by and through a local education agency.
- XI. ...develop and implement regulations whereby state education agencies are required to reject any project application which does not include documentary evidence, filled out and signed by nonpublic school officials, showing that appropriate nonpublic school officials were involved in the planning process from the earliest planning stages.
- XIV. ...appoint a task force of appropriate state and federal representatives for the purpose of developing meaningful and productive reporting procedures for ESEA Title III and/or ESEA Title IV.

#### The State Education Agencies

- VIII. ...carefully review the administration of guidance and counseling programs under Title III and take the necessary action to insure the continuation of the best aspects of the program under Title IV of the Elementary and Secondary Education Act.
- IX. ...insure that nonpublic school representatives are involved in the needs assessment, planning, development and operation of all projects in which they are eligible to participate.

#### The ESEA Title III State Advisory Councils

- XIII. ...review the reporting requirements of the legislation and make every effort to submit significant and meaningful annual reports.

#### The Local Education Agencies

- XV. ...give special consideration to the development of project proposals which are innovative, broad in scope, and designed to find solutions to critical problems facing our schools.

In the past, the National Advisory Council has had the opportunity of following through with recommendations made in its annual report on Title III. This is not the case with this report. The responsibility must now be assumed by supporters of educational innovation and support.



## LEGISLATION: A NEW MANDATE

### THE EDUCATION AMENDMENTS OF 1974

The main challenge that the education community will face in the next two years has been framed in the Education Amendments of 1974 which call for a massive reordering of education resources. Major responsibilities for the implementation of the new legislation lie with consumers of federal education dollars in state and local education agencies.

The Title IV consolidation requires a regrouping of federal, state and local administrative and management partnerships. The general provisions contained in Title V of the same amendments require that the planning, implementing and monitoring procedures for federally funded education programs be reorganized. The amendments also require a regrouping of innovative programs and offer a new challenge for state and local program directors and for members of state advisory councils.

The history of the Education Amendments of 1974 dates back to January 1973 when President Nixon advanced an education special revenue sharing proposal that would have repealed most of ESEA by replacing it with a system of block grants to the states. The bill was not well received and the 92nd Congress adjourned without passing it. In January 1973, Rep. Carl Perkins (D-Ky.) introduced a bill (H.R. 69) to extend ESEA with only modest changes for five years. Hearings were convened in late January and lasted for nearly seven months. In late March, the Administration submitted its revised education special revenue sharing bill, called "The Better Schools Act," which would have consolidated most categorical programs.

During testimony by the Department of Health, Education and Welfare, Congress learned that the Administration would not submit ESEA for extension; it wanted revenue sharing. The Administration's budget was geared to its revenue sharing bill which Congress had not yet seen. The bill was finally introduced in April; but by that time so much damage had been done to the Administration's case that Rep. Albert Quie (R-Minn.) confidently announced that the Administration's bill would not get through Congress.

On June 8, 1973, U.S. Commissioner of Education-designate John Ottina informed chief state school officers by letter that the Administration was giving up insistence on its revenue sharing proposal for fiscal year 1974 and would, instead, fund the categorical programs which were slated to be folded into the revenue sharing package.

It became apparent that the new legislation for renewal of ESEA would not be completed before the end of the fiscal year. On July 1, 1973, an automatic one-year extension of ESEA programs went into effect and Congress passed a continuing resolution to fund the existing programs at the level of the preceding fiscal year.

The House General Education Subcommittee concluded its hearings on H.R. 69 in July 1973 and moved to mark-up sessions to ready the bill for the House Education and Labor Committee. During a final week of mark-up in August, the Subcommittee reached a compromise between the proponents of extension of ESEA and proponents of consolidation. The compromise included a minimum funding provision and state administration changes. It was also agreed that the U.S. Office of Education could not use the consolidated funds in a discretionary manner. Formerly the Commissioner had discretionary authority over 15 percent of ESEA Title III and all of the ESEA Title VIII and Environmental Education funds.

The Subcommittee's amended version of H.R. 69 was reported to the House Committee on Education and Labor on September 5, 1973, after Congress returned from its August recess. The full Committee went into mark-up sessions on the bill and in a close vote reversed its Subcommittee and made major changes in the grants consolidation.

The Committee's action on the consolidation proposals came in spite of a "major policy initiative" by the administration on education special revenue sharing. In return for "substantial" grants consolidation, the Administration offered to give up its insistence that The Better Schools Act be passed. It agreed to increase the budget request for elementary and secondary education by \$540

million for fiscal year 1975, with a provision for forward funding of education programs so that school districts would know a year ahead how much money they would be getting.

The day after it had rejected the Subcommittee's grants consolidation proposal, the Education and Labor Committee agreed to permit a reconsideration of the previous day's close vote. The Committee reached a compromise on consolidation by which two categories would be created, "Support and Innovation" and "Libraries and Instructional Resources."

When the second session of the 93rd Congress convened, the Education and Labor Committee held mark-up sessions to reflect the results of public hearings. The bill was reported to the full House which debated and made amendments, finally passing the bill on March 27, 1974.

In the meantime, the Senate held hearings on a companion bill (S. 1539) which offered an administrative consolidation but did little toward grants consolidation. The Administration threatening to veto the Senate version of the bill, made clear that if there were no grants consolidation, there would be no bill. The Senate passed its bill on May 31, 1974.

The two versions of the Education Amendments of 1974 went to a House-Senate Joint Conference Committee. Members of the education committees from each House met between June 6 and July 23 to resolve the differences in the two bills. The major issues were the formula for ESEA Title I and school busing. In the process, the administrative consolidation from the Senate and the grants consolidation from the House bill were adopted with little opposition. The Senate and the House accepted the conference report and passed the Education Amendments of 1974. President Ford signed the bill, making it Public Law 93-380, on August 21, 1974.

#### The Effect on ESEA Title III

Under the provisions of the Education Amendments of 1974, Title III is consolidated with six other programs into ESEA Title IV, known as "Libraries, Learning Resources, Educational Innovation and Support." The consolidation, to be implemented during two fiscal years, 1975 and 1976, will remove categorical specifications for programs which it covers. Instead, the earmarked funds will be pooled into two block grants with local education agencies assuming the major responsibility for administration of the allocations.

The first block grant, "Libraries and Learning Resources" (Part B of Title IV) combines within a single authorization the library program (ESEA Title II), the equipment program (National Defense Education Act of 1958, Title III), and guidance, counseling and testing (part of ESEA Title III).

The second grant, "Educational Innovation and Support" (Part C of Title IV), combines supplementary educational centers and services (ESEA Title III), dropout

prevention (ESEA Title VIII, Sec. 807), nutrition and health (ESEA VIII, Sec. 808) and strengthening state and local education agencies (ESEA Title V).

The consolidation combines the funds from seven separate categorical programs into two block grants that go directly to the states. Each state is to establish a state advisory council for Title IV (Parts B and C) by April 1975 and Title III state advisory councils are scheduled to be replaced completely by June 30, 1976.

The process of consolidation is to span a two-year period. During the first year, existing categorical aid programs are to continue while regulations are developed by the U.S. Office of Education to implement the 1974 amendments. In this way, the consolidation is "held harmless." (Congress frequently uses "hold harmless" provision to protect a program that could be adversely affected by changes in administrative procedures or program requirements. Such provisions set conditions that must be met before a change can go into full effect.)

The consolidated appropriation for Part B of Title IV (Libraries and Learning Resources) must be at least equal to the fiscal 1973 or 1974 appropriation level for the categorical programs that are to be consolidated.

The consolidated appropriation for Part C of Title IV (Educational Innovation and Support) must be at least equal to the sum of its constituent parts. This means that the fiscal 1976 appropriation for Part C must equal the sum of the higher amount of the fiscal year 1973 or fiscal year 1974 appropriations for Title III (supplementary centers and services), Title V (state administration), Title VIII, Sec. 807 (dropout prevention) and 808 (nutrition and health). In 1976 and succeeding years the funding level must at least equal \$172,888,000 or any higher amount subsequently appropriated for Part C. In this way the basic amount for each component of the consolidation is protected from federal budget cuts. If the funding level falls below the aggregate figures, all categorical programs (including ESEA Title III) must be fully reinstated.

The second funding condition that would hold the consolidation harmless is the provision calling for advance funding. This provision requires that funds to be spent in any fiscal year for the consolidated program must be appropriated by Congress, approved by the President and made available to the states before the beginning of the fiscal year for which they are appropriated or the consolidation under Title IV will not be in effect for that year. This requirement applies not only to the first year of the consolidation but also to every year that the consolidation is to be in effect. If Title IV is to become operational in fiscal 1976, the funds must be made available to the states before July 1, 1975.

The consolidation is held harmless at the 50 percent level in the first year it is funded. This means that each state will operate a dual program in fiscal year 1976. In the case of ESEA Title III, one half is to be administered according to Title III regulations and the other half is

folded into Title IV, with guidance, counseling and testing going into Part B (Library and Learning Resources) and supplementary centers and services becoming part of Part C (Innovation and Support). In future years Title III will be completely phased out and all allocated money will be available for Part B and Part C of Title IV.

#### Title IV State Advisory Councils

The 1974 amendments require establishment of a new state advisory council for Title IV and eliminate the existing councils for Title III. Each state's council is to be appointed by the state education agency or as otherwise provided by state law. The Council is to be broadly representative of the cultural and educational resources of the state and the public. Each state must appoint its council at least ninety days before the beginning of the fiscal year. The state must certify the membership of the Council to the U.S. Commissioner of Education. Once the certification is accepted, the council must meet within thirty days, elect a chairman, and have at least one public meeting per year in which the public has an opportunity to express views on the administration of the State's Plan.

The Title IV councils are to function in much the same capacity as have advisory councils for Title III. Their principal responsibilities are: advising the state education agency, evaluating programs and projects, and preparing an annual report of council activities, evaluations and recommendations to the U.S. Commissioner.

In its advisory role, the council is to participate in the preparation of the State Plan. It is also to advise the state education agency on policy matters arising from the administration of the State's Plan. Included in such policy

matters are the development criteria for the distribution of funds and the approval of applications for assistance.

The state advisory councils for Title IV will have responsibilities for broader program planning than either optional councils for ESEA Title II or the ESEA Title III statutory councils.

The members of the Title IV councils are to reflect a broadened definition of cultural and educational resources, including local education agencies and private, non-profit elementary and secondary schools. Additionally, the advisory council will be required to evaluate all programs and projects at least annually. The state must provide for disseminating the results of the evaluations.

#### The Mandate

Although a large segment of the education community was opposed to some parts of the Education Amendments of 1974—including the consolidation of ESEA Title III into Title IV—there are numerous indications that citizens and educators working at all levels are contributing to the effective development of the new program. The need for advancing the causes of educational innovation and development is just as great in 1975 as when the program was introduced nearly ten years ago.

As we begin the transition from ESEA Title III to Title IV it would be well to be reminded of the two major aspects of the education process. One is educating children. The other is keeping Congress informed as the successes and failures encountered in educating children. A principal part of what educators hope to accomplish is dependent upon what Congressmen do each year either in authorizing programs or appropriating money for these programs.

## THE NEED FOR ORGANIZATIONAL DEVELOPMENT AND LEADERSHIP

Creative organizational development and leadership in education will be necessary throughout the seventies due to demands for increased citizen participation in decision making, greater emphasis on educational and fiscal accountability and because of substantial increases in the cost of education.

It seems appropriate to take a close look at the leadership being exercised in American education. It is an appropriate time to look at organizations and the roles they play individually and collectively in bringing about improved educational methods and procedures.

In the preceding section of this report, the Education Amendments of 1974 were reviewed. In this section the organizations which have a responsibility for the effective administration and development of education programs will be analyzed. An attempt will be made to place the subject of "organizational development and leadership" in perspective by taking a look at leadership capabilities; the roles, assets, liabilities and needs of organizations with responsibility for the administration of Title III of the Elementary and Secondary Education Act and for the development of the newly established Title IV. Table I outlines the responsibilities of these organizations. The table shows that many organizations—the U.S. Congress, the U.S. Office of Education, the National Advisory Council on Supplementary Centers and Services, state education agencies, state advisory councils and local education agencies—have a

responsibility to perform leadership and development roles. If these roles are not properly performed or if they are neglected completely, the entire program pays the penalty.

### The United States Congress

The basic function of Congress is law-making. Other Congressional powers: appropriating, investigating and mediating, are based on the power to legislate. Citizen participation in the law-making process is encouraged by Congress primarily through public hearings. The public is informed through the *Congressional Record* and the printing of the hearings and findings on legislation and appropriation bills.

The Congress provides direction to American education through legislation and appropriations. Through these processes Congress, in part, sets the tone for education and largely determines the place and the role of the schools in our society.

The vision of the Congress often is not appreciated by program administrators who resist changes in legislation. An example is the 1967 amendments to ESEA which provided for state administration of Title III funds. As a result, the states were required to take an active role and ESEA Title III became a stronger program. In effect federal, state and local agencies became more active in bringing about systematic changes in education.

Table I

LEADERSHIP AND DEVELOPMENT RESPONSIBILITIES OF ORGANIZATIONS ASSOCIATED WITH TITLE III						
	U.S. Congress	U.S. Office of Education	National Advisory Council	State Education Agency	State Advisory Council	Local Education Agency
Legislation	X					
Hearings	X	X	X	X	X	X
Appropriations	X					
Hearings	X	X	X	X	X	X
Regulations	X	X	X			
Needs Assessment		X		X	X	X
State Plan		X		X	X	
Technical Assistance		X		X		
Proposal Review		X		X	X	
Recommends Policy		X	X	X	X	X
Implements Policy		X		X		X
Evaluation		X	X	X	X	X
Dissemination/Diffusion		X	X	X	X	X
Nonpublic School Participation		X		X	X	X
Guidance, Counseling and Testing		X		X	X	X
Special Education (Handicapped)		X		X	X	X
Commissioner's Discretionary Funds (15%)		X		X		X
Annual Report		X	X	X	X	X



A weakness of the Congress has been the lateness in appropriating funds for education programs. Effective planning by local and state education agencies has been extremely difficult because of late funding. Prior to the "forward funding" provision of Title IV of the 1974 amendments, the Congress had not passed an education appropriations bill before the start of a fiscal year in more than five years, as shown by the following table:

Table II

Date Fiscal Year Began	Date Bill was Signed into Law	Months Late
July 1, 1969	March 5, 1970	9
July 1, 1970	August 18, 1970	2
July 1, 1971	July 9, 1971	1
July 1, 1972	Continuing Resolution	12
July 1, 1973	December 18, 1973	6
July 1, 1974	December 27, 1974	6

Nearly every state has reported that late funding has placed an unnecessary burden on state and local education agencies. The Congress reduced some of the problems associated with late appropriations by passing the "Tydings Amendment" in 1970. It permitted states to carry over unobligated funds from one fiscal year to the next.

Congress has eliminated the problems associated with late appropriations in parts B and C of Title IV, P.L. 93-380, by requiring (as a condition for consolidation of the categorical programs) that appropriations must be made and all funds must be available for obligation by states on the first day of each fiscal year. Congress has made a major breakthrough in the appropriations process for the two programs contained in Title IV. This change should result in effective long-range planning and efficient administration of Parts B and C of Title IV.

Another problem frequently cited by the states is the relatively low amount of funding allocated to ESEA Title III. In spite of Title III's worthy mission of bringing improvements and innovation to classrooms, its appropriation has always been considerably less than its authorization.

Table III summarizes the authorizations and appropriations for Title III from 1966 through December 27, 1974 when President Ford signed the fiscal year 1975 supplemental appropriations bill.

Table III

Fiscal Year	Authorization	Appropriation
1966	\$100,000,000	\$75,000,000
1967	175,000,000	135,000,000
1968	500,000,000	187,000,000
1969	510,000,000	164,876,000
1970	550,000,000	116,393,000
1971	550,000,000	143,243,000*
1972	575,000,000	146,248,000*
1973	605,000,000	171,313,000*
1974	605,000,000	146,353,000*
1975	605,000,000	120,000,000*

\*Includes NDEA Title V-A (Guidance, Counseling and Testing), which was consolidated into ESEA Title III.

#### Recommendation No. 1

*That the U.S. Congress provide adequate funding for educational innovation and improvement and that the advance funding process be broadened to include all programs dealing with elementary and secondary education.*

In the Education Amendments of 1974, Congress again declared its continuing strong interest in the form and substance of federal education policy. Many of the components of the new law reflect Congressional concern over the administration of education programs. Moreover, certain provisions are clear responses to Congressional frustration arising from insufficient or outdated statistical and analytical reports. For example, Congress has been dissatisfied with the reporting exemplified by such documents as the U.S. Commissioner of Education's Annual Report, which has devoted little more than a descriptive paragraph to each federally administered program. The most recent annual report (March 31, 1974, p. 17) analyzes Title III in this way:

Among the most innovative ESEA programs is Title III, which supports supplementary educational centers and services designed to demonstrate innovative and exemplary practices. OE obligated more than \$146 million in FY 1973 Title III funds. Over the past year, it has devoted special efforts to evaluating programs supported under Title III, identifying those that are exemplary and disseminating information about them to school districts which may wish to follow their lead.

The Commissioner of Education has traditionally been the chief spokesman on the state of education in the United States and it is imperative that the reporting procedures within the U.S. Office of Education be vastly improved.

#### Recommendation No. II.

*That the U.S. Commissioner of Education upgrade his annual report to insure that it reflects the status of American education and includes a current review of the operation of federal programs.*

Although the Department of Health, Education and Welfare can well be satisfied with many of its contributions to ESEA Title III, it also has had major shortcomings. For example, it has not been effective in providing the Congress with current and relevant information on Title III. Testimony before Congressional hearings on legislation and appropriations has been totally inadequate for Congress to make decisions. This, in part, has resulted from the failure of the respective agencies to adequately assess the programs and a reluctance on the part of the Congress to require federal agencies to produce the information necessary for effective decision making.

The appropriations subcommittees rely almost totally on information supplied by members of the Department of Health, Education and Welfare and members of the U.S. Office of Education. This has resulted in a major weakness in arriving at appropriation levels. At first glance, Health, Education and Welfare and U.S. Office of Education officials would appear to be the best sources for appropriations testimony; however, a careful examination reveals that members of the Department of Health, Education and Welfare and the U.S. Office of Education are permitted to supply only the amount and kind of information which will support the President's budget request. For example, the President's budget request for funding of ESEA Title III in fiscal year 1974 was zero. Members of the Department of Health, Education and Welfare and the U.S. Office of Education were required to testify that the request was appropriate and that the program should not be continued. Fortunately, the program was continued and operated under a continuing resolution throughout the year. The appropriations committees could obtain more accurate information if persons outside the Executive Branch of government were invited to testify before the appropriations committees.

#### Recommendation No. III

*That Congressional appropriations committees encourage written and oral testimony from representatives of large and small school districts, state education agencies and state and national advisory councils.*

Congress imposed new reporting and analytical requirements on the Department of Health, Education and Welfare in the Education Amendments of 1974. The Secretary of Health, Education and Welfare is now required to submit to the House and Senate an "annual evaluation report" of the effectiveness of education programs in achieving their legislated purposes together with recommendations to improve the effectiveness of the programs.

In the evaluation of specific programs and projects the report must:

1. set forth goals and objectives for all programs and projects,
2. contain information on the progress made during the previous fiscal year toward the achievement of such goals and objectives,
3. describe the costs and benefits of the program being evaluated,
4. contain plans for implementing corrective action and recommendations for new or amended legislation, and
5. contain a listing of the principal analyses and studies supporting the major conclusions and recommendations in the report.

The report is to include a survey of how many educationally and economically disadvantaged children participate and do not participate in ESEA programs. In addition, the report must include a brief description of each evaluation conducted in the previous year.

The Assistant Secretary for Education in the Department of Health, Education and Welfare is responsible for the direction and supervision of the Education Division which includes the U.S. Office of Education, the National Center for Education Statistics and the National Institute of Education. The 1974 amendments require the Assistant Secretary to submit to Congress a comprehensive evaluation report on education programs at least one year before the programs legislative or appropriations authority expires. This report must specifically include for each program: (1) a history of budget requests, appropriations, authorizations and expenditures, (2) a history of legislative recommendations made by the President and their disposition, and (3) a history of legislative changes made in applicable statutes. In addition, the report should recommend improvements and should include a compilation and summary of all evaluations of the program. Finally, the Assistant Secretary shall recommend whether the program should be continued and give reasons for the recommendation.

The Assistant Secretary is also required to publish an annual compilation of all innovative projects assisted under

programs administered in the Education Division (National Institute of Education, National Center for Educational Statistics and the U.S. Office of Education), including Title III and Part C of Title IV.

These reporting instruments can serve a vital function if they are employed as mechanisms to provide the kind of information needed by Congress in order to rationally assess the impact of existing programs and to legislate remedies to continuing or newly emerging education problems.

#### Recommendation No. IV

*That the Assistant Secretary for Education commit the necessary resources for a thorough and continuing analysis of operating education programs.*

A commitment to accurate, complete and timely reporting could yield many positive side effects. State and local governments would be more responsive and responsible in meeting their reporting requirements if they were assured that the information would be used to improve programs.

Title III requires the states to report annually to the U.S. Office of Education and to the National Advisory Council on their progress in monitoring and evaluating projects but the reports never have been compiled and transmitted to Congress and the President for their consideration. When reports are not used, such a reporting responsibility is devalued and is considered a bureaucratic time-waster.

To the contrary, the states have shown a great deal of initiative in responding to requests for information and data when there is an incentive to do so. If the data in state reports were subsequently used in reports to Congress, the states would readily recognize the opportunity and the obligation to make their reports as complete and accurate as possible. Further, if accurate assessment and evaluation of programs were available from the Education Division of the Department of Health, Education and Welfare, the states could better participate in the formulation of legislative policy proposals that affect their conduct in administering education programs.

The schools were badly victimized by the lack of information given to Congress in the most recent round of appropriations legislation which slashed \$26.4 million from Title III's operating budget. The lack of appropriate testimony in behalf of Title III resulted in the House and the Senate Appropriations Committees expressing a mutual "concern" that all 1800 projects funded by Title III could not be properly monitored and controlled "in a way that would allow successful projects to be replicated."

To remedy the misuse and nonuse of state reports for Title III and other programs, the Congress has placed responsibilities for all reporting and analysis squarely in the Education Division of the Department of Health, Education and Welfare. According to the 1974 law, the various

national advisory councils are to be only peripherally involved in the reporting process. In the future, each state will be required to submit a report on the use of federal funds in that state for all applicable programs within sixty days after the end of a fiscal year. The report must include a list of all grants and contracts made under each program to local education agencies within the state and must identify the federal funding source.

The previous fiscal year is to be reported in greater detail. The fiscal year 1975 report, for example, must include the list and source information (noted above) for fiscal 1975 and it must also include the following items pertaining to programs and projects operating in fiscal 1974: (1) a compilation of reports from local educational agencies and other private and public agencies and institutions listing the amounts of federal funds received and the purposes for which they were expended and (2) a statistical report on the individuals served or affected by programs, projects or activities assisted with federal funds.

The critical change that Congress made in modifying the state reporting mechanism was a specification of what action must be taken in the U.S. Office of Education once the states have fulfilled their reporting responsibility. The Commissioner is required to submit to Congress by October 15 of each year, an analysis and compilation of the reports and the statistical data derived from the states.

The Congress should hold the Education Division accountable for the full compliance with the new reporting criteria and the Education Division should surpass mere compliance in its reporting and analysis of programs. State administrators and advisory council members should take a new look at their reporting procedures to recognize that the reports will be useful tools in education policy formulation.

The reporting responsibility should be treated as if it were a new reporting power that the states have acquired. Through the vehicle of state reports that are to be synthesized and presented to Congress by the U.S. Office of Education, the states have gained a new type of access to Congressional policy makers.

#### United States Office of Education

The original act which established the U.S. Office of Education in 1867 mandated as the organization's primary mission, "assessing the status and progress of American education." Although this is a worthy and necessary function, the role of the country's leading education organization has broadened considerably over the past century.

The U.S. Office of Education's role in American education is threefold according to a June 28, 1974 statement entitled "The Forward Plan—FY 1976-1980" by Commissioner Terrel H. Bell. The three areas of federal concern are: (1) addressing needs and problems which are national in scope and consequence, (2) advancing the state of the art on the quality and relevance of American



education, and (3) assessing the status and progress of American education.

The Congress decides on the legislation that will ultimately determine the role of the U.S. Office of Education. An indication of how Congress sees the Office of Education is included under the "General Education Provisions Act" (Sec. 412) which stipulates, among other things, that the U.S. Commissioner of Education shall:

1. prepare and disseminate to state and local educational agencies and institutions information concerning applicable programs;
2. inform the public on federally supported education programs;
3. collect data and information on applicable programs for the purpose of obtaining objective measurements of the effectiveness of such programs; and
4. prepare and publish an annual report on (a) the condition of education in the nation, (b) developments in the administration, utilization and impact of applicable programs, (c) results of investigations and activities by the Office of Education, and (d) such facts and recommendations as will serve the purpose for which the Office of Education is established.

Under the provisions of Public Law 91-230 (ESEA Title III), the U.S. Commissioner of Education is (1) required to provide for effective participation of private school children, (2) required to certify state advisory councils and insure that the councils hold at least one public meeting a year, (3) authorized to use 15 percent of the funds available to the states to fund special innovative and exemplary programs and projects, (4) authorized to require the states to submit a state plan at such time and in such detail as is deemed necessary.

Many states report that the U.S. Office of Education does a commendable job of providing technical assistance to state education agencies. This role has improved considerably since Title III became a state plans program in 1967. The State Plan Administrator's Manual which was developed by the Office of Education has been the basis for the development of the program at all levels.

Another strength of the U.S. Office of Education has been the frequent use of project directors, state education agency staff, and state and national advisory council members in the development of guidelines and strategies. Nearly all activities initiated by the Title III staff of the Office of Education have the approval and involvement of local and state administrators and advisory council members.

In previous reports, the National Advisory Council encouraged a strong national role in dissemination/diffusion by the U.S. Office of Education. In February, 1973 the Council recommended a proposal that many states had emphasized in their reports by recommending that:

The United States Commissioner of Education use a portion of the Title III Section 306 funds which are discretionary to the Commissioner to provide funding to limited numbers of projects which have developed successful programs and practices under operational Title III grants, to enable the projects to continue operation as models for potential adopters for a period of one or two years after the expiration of their original federal funding.

The subsequent development of the Section 306 strategy on diffusion/adoption by the U.S. Office of Education is an example of using discretionary funds in a unique and innovative way. As a result of the leadership shown by the Title III staff in introducing the diffusion/adoption strategy, approximately one-half of the projects selected for national visibility by the U.S. Office of Education's Dissemination Review Panel were initially funded by Title III—a surprising accomplishment by a program that receives only a small percentage of federal funds for education.

The diffusion/adoption strategy which was developed by the U.S. Office of Education in cooperation with the National Advisory Council and the National Association of State Advisory Council Chairmen, includes two major dissemination efforts designed to share educational success. These strategies, which were developed with ESEA Title III resources, have great promise for the diffusion and adoption of successful validated practices on a large scale. The methods have become nationally recognized as the Identification/Validation/Dissemination (IVD) effort and the Diffusion/Adoption Strategy.

The national IVD effort resulted from an evaluation process used by many state agencies in determining the effectiveness of projects. The program has three major components (1) identification by the state of its most exemplary programs, (2) validation of that claim by a team of out-of-state educators, and (3) dissemination of the project to other local education agencies in the state.

The dissemination part of IVD is the most difficult. The term "dissemination" as used in IVD describes the complex process of bringing a successful educational program from where it is operating to another school or district that has a similar problem or need. The U.S. Office of Education, in cooperation with the states, is trying to bridge the "adoption gap" by tying the IVD effort to another program sponsored by the United States Office of Education and funded from the Commissioner's Title III discretionary funds (Section 306).

Section 306 of Title III reserves 15 percent of Title III funds for the U.S. Commissioner of Education and authorizes him to make grants directly to local education agencies for programs or projects that "hold promise of making substantial contributions to the solution of critical educational problems common to one or several states."

Since the adoption of the amendment these developmental funds have been allocated to the states for specific projects, designed by local school districts. The projects address "priority needs" as determined by the U.S. Office of Education. These include Reading, Environmental Education, Cultural Pluralism, Student Youth Activism, Drug Abuse, Early Childhood Education, Education for the Disadvantaged.

The two complementary programs, the IVD effort and the Section 306 Diffusion/Adoption Strategy, are being given major emphasis in the U.S. Office of Education's move toward an effective program for dissemination. As a part of this program the U.S. Office of Education has begun to coordinate the work of a "Dissemination Review Panel" (DRP) with other dissemination efforts. This panel was set up in 1972 to review all programs, projects, models and materials proposed for dissemination by the Office of Education. Its purpose is to guarantee that there is adequate evidence of program effectiveness before dissemination is approved. The Panel provides quality control by insuring that federally funded projects, such as Title III, are exemplary and worthy of adoption by other school systems.

In fiscal year 1974 approximately 75 percent of the Section 306 funds were used to support a diffusion/adoption strategy which has as its purpose the widespread installation of carefully evaluated, successful demonstration programs. This strategy places major emphasis upon transporting successful programs and practices across state lines. A national network has been set up to link school districts with special needs or problems with those school districts in the nation that have developed successful solutions to the same problems. The network consists of two types of projects: the first, **Developer-Demonstration Projects**, are projects which have submitted comparative evaluation data to the U.S. Office of Education's Dissemination Review Panel and which, as a result of review by the Panel, have been approved for dissemination. The second group are called **Facilitator Projects**. These projects diffuse the Developer Demonstration programs in each state by matching the needs of local school districts with these successful practices.

The Facilitator Projects help pay for the travel costs of potential adopters to Developer-Demonstration Projects, and arrange for and pay for the cost for training of personnel in school districts which install the successful program.

Developer-Demonstrator Projects receive funds to train personnel in adopting school districts and also to provide technical assistance to them during the school year.

The Section 306 Diffusion/Adoption Strategy will diffuse any program or practice which is approved by the DRP regardless of the source of funds used to develop the program.

Under the provisions of the education amendments (P.L. 93-380), the Commissioner's discretionary funds are no longer authorized as a part of Title III. The Diffusion/Adoption Strategy, however, will be funded through June of 1976 with funds available for fiscal year 1975.

The "Special Projects Act" of the new legislation (P.L. 93-380) would be a possible source for the continued funding of the national Identification/Validation effort and the Diffusion/Adoption Strategy. The Special Projects Act authorizes the Commissioner to fund programs designed (1) to experiment with new educational and administrative methods, techniques and practices, (2) to meet special or unique educational needs or problems, and (3) to place special emphasis on national educational priorities.

#### Recommendation No. V

*That the U.S. Commissioner of Education continue the present national Identification/Validation/Dissemination effort and the Diffusion/Adoption Strategy and that funding for these national programs be requested from the Congress or provided through the Special Projects Act.*

A weakness in the ESEA Title III program which has not been corrected deals with the clearance of forms. Annual report forms for fiscal year 1974 and for fiscal year 1975 were not approved by the Office of Management and Budget (OMB) until months after the date when states were supposed to submit their annual reports to the U.S. Office of Education. This problem is not unique to ESEA Title III—it is a problem for most education programs. The lengthy process of clearing forms should be examined by the Congress and by the Office of Management and Budget, Department of Health, Education and Welfare and the U.S. Office of Education. The examination should lead to a streamlined process with sufficient funds and staff made available to develop and clear the forms in a timely manner.

A similar weakness in administering the ESEA Title III program, which is not unique to Title III but general for all educational programs, is the laborious process by which regulations and guidelines are developed, cleared and published in the *Federal Register*. For example, ESEA Title III, Section 306 regulations and guidelines have been in the approval process for years and will become effective only months before Section 306 terminates. The ESEA Title III guidelines for administering state plans will not become effective until later, but probably before June 30, 1975.

The clearance process for regulations and guidelines also should be studied and streamlined. This would enable state departments of education and local school districts to have

clear and specific information concerning the use of federal funds in a timely manner. Some of the reasons for the lengthy delays in developing and clearing regulations are: (1) the Office of General Counsel for the Office of Education reports to the Secretary of Health, Education and Welfare instead of to the U.S. Commissioner of Education, (2) adequate resources in terms of staff positions have not been provided to the Office of General Counsel to enable the Office to dispatch its numerous responsibilities in a timely fashion, and (3) an unusually large number of officials from the U.S. Office of Education and the Department of Health, Education and Welfare review and "sign off" on regulations and guidelines. The process can be streamlined and greatly shortened.

#### Recommendation No. VI

*That the Congress, and appropriate officials from the Department of Health, Education and Welfare and the U.S. Office of Education take whatever steps are necessary to assure that regulations and guidelines for educational programs are promptly developed and issued.*

#### National Advisory Council on Supplementary Centers and Services

The 1967 amendments to the Elementary and Secondary Education Act, which required the states to set up state advisory councils for Title III, also provided for a National Advisory Council to be appointed by the President. The legislation stipulates that the Council shall consist of twelve members representative of the educational and cultural resources of the nation. Members are appointed for terms of three years on a staggered basis.

The National Advisory Council on Supplementary Centers and Services is required by legislation to:

1. review the administration and operation of Title III, including its effectiveness,
2. review, evaluate and transmit to the Congress and the President the state annual reports,
3. evaluate programs and project carried out under this title and disseminate the results thereof, and
4. make recommendations for the improvement of Title III and its administration and operation.

The National Advisory Council has been strong in areas relating to the dissemination of information on innovative projects and in encouraging and expediting national programs such as the Identification/Validation/Dissemination (IVD) effort.

Since January 1971 the Council has released *Quarterly* reports on Title III projects in special education, environmental education, preschool education, the world of work, guidance and counseling, changing educational designs, cultural diversity, school administration, the arts, individualized instruction and the basic skills. More than 50,000 copies of these publications have been disseminated to local and state education agencies. *Quarterlies* on the handicapped and technology are also scheduled for release prior to the Council's scheduled termination on June 30, 1975.

In its effort to improve communications with the ESEA Title III community, the National Advisory Council publishes a bi-monthly newsletter, *Innovation in Education*, which is mailed to 1,800 project directors, 850 state advisory council members and to other groups and individuals associated with Title III. More than 100,000 copies of the newsletter have been distributed.

Since the Council's inception in 1968, six annual reports have been released. Special studies on the involvement of nonpublic school children in Title III projects, the status of guidance and counseling programs, and on state advisory councils were undertaken in 1972.

The Council has also been active in the Identification/Validation/Dissemination effort which it co-sponsored with the National Association of State Advisory Council Chairmen and the U.S. Office of Education. The 190 exemplary projects identified as a result of IVD were publicized in volumes one and two of *Innovative Education Practices*. These publications, which were mailed to more than 30,000 potential adopters, give a brief description of each of the projects certified as being exemplary by out-of-state evaluation teams.

The Council has also cooperated with state education agencies in the development of publications. *The Education Fair: From Concept to Practice*, which was edited by the Arizona State Education Agency and published and disseminated by the National Advisory Council, serves as an example. This publication, as its title emphasizes, is a descriptive analysis of how states can display and demonstrate education projects.

Publications of the Council have played a significant role in the development of the Title III community. The publications have been widely distributed and have provided national recognition for hundreds of local projects. Many of the publications have also been used to inform the Congress about Title III projects and programs in the various states.

The National Advisory Council has had limited success in convincing the Congress to appropriate adequate funding for Title III or to earmark specific funds for an evaluation of the national Title III effort. Although the IVD strategy has been effective in identifying exemplary Title III projects, a meager amount of funding has been expended on determining the effectiveness of other Title III activities such as (1) state advisory councils, (2) state need assessment, (3) evaluation and dissemination strategies, (4) the

effectiveness of the Commissioner's discretionary funds, or (5) the extent to which ESEA Title III has accomplished its mission as outlined in P.L. 89-10, as amended.

Presently, there is need for a national review of the Title III experience. Approximately \$1.5 billion in federal funds have been spent on educational innovation and improvement since the program was introduced by the Congress in 1965; yet a comprehensive evaluation has yet to be made.

A review of the Title III effort could be financed with funds currently available to the Assistant Secretary for Education. The Secretary could appoint an evaluation committee comprised of appropriate ESEA Title III representatives and other interested individuals. They could be responsible for the completion of a final report on ESEA Title III. This report would have special significance because of Title III's unique experience and its imminent consolidation under Title IV.

#### Recommendation No. VII

*That the Assistant Secretary for Education appoint and adequately fund a special study commission for the purpose of documenting the ten-year history of ESEA Title III, determining how effective the program has been in meeting its legislative mandate, and for the purpose of recommending a future course of action for the administration of the program under the provisions of the Education Amendments of 1974.*

#### State Education Agencies

The 1969 Amendments to the Elementary and Secondary Education Act stipulated that 85 percent of Title III funding go directly to the states for state administration and for the funding of innovative and exemplary projects.

To accomplish its legislative mandate, each state develops a State Plan which serves as a legal basis for the state's participation in a federal grant program. The state then identifies its most critical educational needs in cooperation with local education agencies. It encourages local schools to develop creative projects which may meet critical needs. The ultimate goal is one of promoting widespread adoption/adaptation of successful educational methods and procedures that have been developed by local education agencies.

The role of the state education agency is important to the success of the Title III effort. The state serves as stimulator, organizer and coordinator of the program and provides staff and services to local schools for the purpose of assisting in the development of project proposals. After a project has been funded the state agency has responsibilities to provide technical assistance, evaluation and dissemination.

In 1967 the U.S. Congress earmarked 7 1/2 percent of each state's allotment for state administration and for state advisory council activities. This action provided for increased participation by the states in the administration of ESEA Title III and contributed greatly to an improved program.

The 1969 consolidation of NEA Title V-A Guidance, Counseling and Testing, with ESEA Title III appeared to serve the obvious advantage. The programs were dissimilar in their purposes; therefore, many states continued to administer each independent of the other. Some states, however, developed effective strategies for guidance and counseling. Care should be taken to insure that the best aspects of the strategies developed over the past five years are not lost during the implementation of the 1974 amendments.

#### Recommendation No. VIII

*That state education agencies carefully review the administration of guidance and counseling programs under Title III and take the necessary action to insure the continuation of the best aspects of the program under Title IV of the Elementary and Secondary Education Act.*

ESEA Title III is frequently criticized by the nonpublic school community for neglecting its responsibility to meet the needs of all children—public and nonpublic—on an equitable basis. Some states have developed adequate strategies for including representatives of local nonpublic education agencies in the planning and operation of projects; others have not. The U.S. Commissioner of Education's "by-pass," which has been used in Missouri and Nebraska is one method which can be used as a last resort; however, the purpose of the legislation is clearly to include nonpublic school children and teachers in the benefits of Title III and Title IV programs. This purpose can be fulfilled only through the determined and systematic efforts of state and local education agencies and state ESEA Title III advisory councils.

To insure compliance with the law states should (1) require public school districts to assess the needs of nonpublic school children within their districts, (2) require public school personnel to plan and develop proposals cooperatively with nonpublic school representatives so the proposals submitted will meet the needs of both public and nonpublic school children, (3) review each proposal at the state level (perhaps by the nonpublic school representative on the state advisory council) to assure that nonpublic school children will receive equitable benefits from the proposal if funded, and (4) send communications to all nonpublic schools in the state when communications about Title IV are sent to public school officials.



To insure that nonpublic schools are included in all ESEA Title III and/or Title IV programs in which they are eligible to participate and to insure the improvement of all schools—public and nonpublic—the national advisory council makes three recommendations.

#### Recommendation No. IX

*That state education agencies and state advisory councils insure that nonpublic school representatives are involved in the needs assessment, planning, development, operation, and development of all projects in which they are eligible to participate.*

#### Recommendation No. X

*That the U.S. Office of Education and state education agencies develop procedures whereby nonpublic schools may initiate project proposals for submission by and through a local education agency.*

#### Recommendation No. XI

*That the U.S. Office of Education develop and implement regulations whereby state education agencies are required to reject any project application which does not include documentary evidence, filled out and signed by nonpublic school officials, showing that appropriate nonpublic school officials were involved in the planning process from the earliest planning stages.*

State reporting has been a consistent weakness on the part of state education agencies. This weakness, of course, is not totally the fault of state education agencies. It must also be shared by the National Advisory Council and the U.S. Office of Education.

The State Plan Administrator's Manual requires states to annually submit a State Report on the program to the U.S. Commissioner of Education. The state report is designed to help the Commissioner determine "the extent to which funds provided... have been effective in improving the educational opportunities of persons in the areas served by the program or projects." State advisory councils are required to submit a similar report of their activities and recommendations to the U.S. Commissioner of Education and to the National Advisory Council.

In a report commissioned by the National Advisory Council, *A Study of ESEA Title III State Advisory Councils*, the author, Mr. William Furry, says:

There is widespread agreement (in the Office of Education, the President's National Advisory Council, and the states) that the Title III advisory council reporting system can be greatly improved... A

vicious circle exists: poor reports, nobody pays any attention to; no attention, poor reports... The Office of Education must adopt the practice of responding in writing to the Councils on their reports. This letter should note which recommendations will be pressed in Congress by the Office and the President's National Advisory Council for Title III, and explain why other recommendations are not being pursued or are of lower priority. This feedback and the accompanying efforts in Congress, are essential if the reporting system is to produce meaningful recommendations, and cover its costs.

The new legislation (P.L. 93-380) will give the states even greater latitude in administering innovative education programs; therefore, the need for accurate and detailed state reports will take on added significance.

#### State Advisory Councils

ESEA Title III state advisory councils are involved in all aspects of the program and its operation. They advise the chief state school officer and review the administration of policy through the Title III coordinator.

In performing their functions of reviewing, reporting, recommending and advising, state advisory councils are instrumental in developing the Title III program in the respective states. Members promote the development and dissemination of new practices which are designed to solve education problems and are therefore influential in stimulating better ways of educating children.

Title III legislation requires that the state advisory council be broadly representative of the cultural and educational resources of the state and of the public, including persons representative of elementary and secondary schools, institutions of higher education and areas of professional competence in dealing with children needing special education because of physical or mental handicaps.

As stipulated in the legislation, councils are required to include representatives from elementary and secondary schools, institutions of higher education and the field of special education. In addition, the U.S. Office of Education directed the states to include on each council a representative of low income groups. The merger of ESEA Title III with Title V-A of the National Defense Education Act in April 1970 required each council to add a counseling and testing representative. According to a U.S. Office of Education directive, neither the chief state school officer nor members of the state education agencies can serve as chairman or as voting members of the state Title III advisory council.

The Congress is to be applauded for recognizing that the effective service of the Title III state advisory councils will also be necessary in the context of the consolidated programs of Title IV. There is a concern, however, about

the successful operation of the new councils. The law requires the states to fund state administrative and advisory council activities out of the same small sum of money. The advisory council and the state agency must share the greater amount of either \$225,000 or five percent of the allotment for all of Title IV (except the 15 percent of Part C that is for strengthening state and local education agencies). After the first year, the states will have only slightly more money to administer all the parts of Title IV than is currently being used to administer ESEA Title III. This could seriously limit the advisory and evaluative capacity of the councils and the administrative capacity of the states.

#### Recommendation No. XII

*That funds for administration be increased from five percent to 7-1/2 percent with the additional amount specifically earmarked for project, evaluation and dissemination/diffusion of innovative education programs.*

ESEA Title III state advisory councils were created to represent the public point of view in education decision making. In most states, the councils are aggressive, informed, working committees; therefore, the council's reports should reflect the council's activities. In addition, they should be used as a vehicle for improving the program. Unfortunately the reports which contain a summary of the council's activities, recommendations and evaluations have not been used adequately by either the National Advisory Council or the U.S. Office of Education. Since little attention has been paid to the reports, a pattern of poor reports has not only been accepted but encouraged. State reports are usually submitted after the National Advisory Council's report has been submitted to the President and the Congress; therefore, recommendations by the states have been given only slight attention.

#### Recommendation No. XIII

*That state advisory councils review the reporting requirements of the legislation and make every effort to submit significant and meaningful annual reports.*

The problem with state reporting rests primarily with the forms clearance process in the U.S. Office of Education and in the Office of Management and Budget (OMB). It is impossible for state education agencies and advisory councils to comply with the law when forms are approved by OMB long after the forms are due to be submitted to the U.S. Office of Education (October 1). Reporting forms for state reports due October 1, 1974 were approved by OMB in January 1975, although the Office of Education submitted the forms for clearance in December 1973.

The entire reporting procedure for ESEA Title III and/or Title IV (P.L. 93-380) should be reviewed and improved. The present arrangement has put an unnecessary burden on state advisory councils and on state education agencies.

#### Recommendation No. XIV

*That the U.S. Commissioner of Education appoint a task force of appropriate state and federal representatives for the purpose of developing meaningful and productive reporting procedures for ESEA Title III and/or Title IV of P.L. 93-380.*

#### Local Education Agencies

The more than 1,800 school districts currently receiving ESEA Title III funds make up the core of the Title III program. The importance of local education agencies in administering the program is reflected in their expenditure of more than \$1 billion on Title III activities since the program was introduced in 1965.

The original law (P.L. 89-10) provided for grants to local educational agencies for supplementary educational centers and services to provide vitally needed educational services and to establish exemplary model school programs. In 1967, Public Law 90-247 amended Title III goals to include an emphasis on innovative and exemplary programs. In 1969 the law was amended to provide guidance and counseling activities and a discretionary fund for the Commissioner. Nevertheless, Title III continued to emphasize local innovation and local leadership in seeking solutions to national problems.

The leadership exerted by local education agencies reflects the contribution of individuals, communities, and colleges; of public and nonpublic schools; and of advisory committees and consultants—each with a concern for bringing about educational change. Local leadership is the whole purpose for Title III's existence. The planners and the project directors are the vanguard of educational improvement; their work is what Title III is all about.

The mission of bringing improved methods and procedures to classrooms is one that can never be completed. The problems that face our schools are usually mere reflections of broader societal problems. The textbook controversy in Kanawha County, West Virginia, and the racial problems in Boston, Massachusetts, serve as prime examples of problems that must not only be faced but solved. Title III is in the unique position of having the responsibility to find innovative ways to deal with these problems and many others, such as improving race relations, preparing students for the world of work, developing alternative schools for children who are potential dropouts, providing for greater community participation and dealing with many other problems that serve as roadblocks to effective education.

## Recommendation No. XV

*That local education agencies give special consideration to the development of project proposals which are innovative, broad in scope, and designed to find solutions to critical problems facing our schools.*

Title III projects have left their mark on all areas of the curriculum—from improved administrative strategies to individualized instruction and from physical education to mathematics and family life education. Successful widespread innovation and reform in American education will be brought about only by providing funds to local schools for the purpose of administering locally designed and developed programs.

Innovative ideas can come from any source—local, state or national—but their success in being adopted at the local level depends on the commitment and support of students, teachers, school board members and citizens who ultimately determine the value of the programs. Title III programs build such a commitment.

### Final Thought

On April 11, 1975, ESEA Title III will be ten years old. "It was born of the conviction," Harold Howe II said in

1968, "that if our schools did not change—if they did not seem capable of coming up with adequate ways of meeting the mounting educational needs of the nation's young—it was not because our schools and our communities were empty of creative ideas and individuals." It was because, he said, "schools needed a stimulant to seek out new ideas, to risk the failure, the controversy, the difficulty that must inevitably accompany the new and the different the untried and the untested."

Title III has provided that stimulant for some ten years. Its accomplishments and its failures are now a part of the records of local and state education agencies. Successes and failures have been difficult to measure. How, for example, can we accurately measure the impact of a class for handicapped children upon students who would otherwise have been deprived of the special program? How do we measure the real significance of changing a traditional classroom to one that emphasizes individualized instruction? Or for that matter, what is the value to society of using a better method of teaching children to read?

The \$1.4 billion spent on Title III, since the Elementary and Secondary Education Act was signed into law by President Lyndon B. Johnson, is not a large sum of money when compared with other federal expenditures. Yet, this investment in the education and in the lives of our children must certainly be considered one of our wisest and most profitable.

FISCAL YEAR 1975 ALLOCATIONS  
ELEMENTARY AND SECONDARY EDUCATION ACT, TITLE III

	State Allotment	Amounts Reserved for 3(c) Activities	85% States' Share		15% Commissioner's Share	
			Total for Grants to LEAs	15% for Handicapped	Total for Grants to LEAs	15% for Handicapped
U.S. and Outlying Areas	\$119,725,000	\$ 10,786,121	\$ 92,840,547	\$ 13,896,075	\$16,348,332	\$2,452,249
50 States and D.C.	118,577,250	10,586,121	91,792,460	13,768,863	16,198,669	2,429,800
Alabama	2,008,862	150,000	1,580,033	237,005	278,824	41,824
Alaska	511,894	150,000	307,440	46,116	54,264	8,138
Arizona	1,277,880	150,000	958,872	143,800	189,176	26,377
Arkansas	1,273,489	150,000	954,986	143,246	188,523	26,278
California	10,180,656	710,278	8,049,821	1,207,471	1,420,557	213,084
Colorado	1,491,951	150,000	1,108,888	165,999	195,293	29,294
Connecticut	1,765,468	150,000	1,373,148	206,972	242,320	36,348
Delaware	619,436	150,000	399,021	59,853	70,415	10,562
Florida	3,692,024	257,583	2,919,275	437,891	515,166	77,275
Georgia	2,607,666	181,930	2,061,875	309,281	363,860	54,579
Hawaii	731,585	150,000	494,330	74,150	87,235	13,086
Idaho	709,132	150,000	475,282	71,289	83,870	12,580
Illinois	5,805,553	405,039	4,870,437	688,586	810,077	121,512
Indiana	2,878,319	200,813	2,276,880	341,382	401,626	60,244
Iowa	1,693,313	150,000	1,311,816	196,772	231,497	34,726
Kansas	1,380,778	150,000	1,046,161	156,924	184,617	27,693
Kentucky	1,887,976	150,000	1,477,280	221,592	260,896	39,104
Louisiana	2,172,415	151,584	1,717,722	257,668	303,127	45,469
Maine	826,356	150,000	574,903	86,103	104,415	15,667
Maryland	2,260,776	157,708	1,787,353	268,103	315,415	47,312
Massachusetts	3,055,979	213,061	2,414,895	362,204	428,123	63,918
Michigan	4,884,371	337,282	3,822,526	573,379	674,563	101,188
Minnesota	2,200,052	153,492	1,739,576	260,936	306,984	46,048
Mississippi	1,442,652	150,000	1,098,754	164,813	193,896	29,085
Missouri	2,548,598	177,809	2,015,170	302,276	355,519	53,343
Montana	691,792	150,000	480,523	69,079	81,289	12,190
Nebraska	1,057,087	150,000	771,024	115,854	136,063	20,409
Nevada	526,786	150,000	379,788	56,965	67,018	10,063
New Hampshire	707,989	150,000	474,291	71,144	83,898	12,564
New Jersey	3,836,489	267,862	3,033,593	455,026	535,324	80,299
New Mexico	885,034	150,000	624,779	93,717	110,255	16,538
New York	9,072,324	632,953	7,173,485	1,076,018	1,265,906	189,886
North Carolina	2,805,551	195,738	2,218,343	332,761	391,472	58,721
North Dakota	653,415	150,000	427,903	64,186	75,512	11,327
Ohio	5,593,749	390,227	4,422,569	663,366	780,453	117,069
Oklahoma	1,539,157	150,000	1,180,783	177,117	208,374	31,256
Oregon	1,342,169	150,000	1,013,444	152,002	178,826	26,824
Pennsylvania	6,007,767	419,247	4,750,327	712,549	838,293	125,744
Rhode Island	782,683	150,000	537,781	80,667	94,902	14,235
South Carolina	1,826,547	150,000	1,256,765	188,515	221,782	33,267
South Dakota	672,376	150,000	444,020	66,804	78,366	11,753
Tennessee	2,221,769	155,007	1,756,748	263,512	310,014	46,582
Texas	6,053,003	423,303	4,786,095	717,914	844,806	126,691
Utah	899,811	150,000	637,169	95,575	112,442	16,866
Vermont	584,186	150,000	352,068	52,806	62,398	9,319
Virginia	2,583,855	189,269	2,043,048	306,457	360,538	54,081
Washington	1,924,986	150,000	1,508,738	226,311	268,248	39,837
West Virginia	1,186,073	150,000	862,812	129,422	152,261	22,836
Wisconsin	2,526,368	176,268	1,997,583	299,639	352,517	52,877
Wyoming	511,937	150,000	307,846	46,147	54,291	8,144
District of Columbia	671,494	150,000	443,270	66,490	78,224	11,734
American Samoa	123,093	50,000	62,129	9,319	10,964	1,645
Guam	255,038	50,000	174,282	10,142	30,756	4,613
Puerto Rico	1,768,025	150,000	1,376,321	206,298	242,704	36,406
Trust Territory	279,212	50,000	194,830	29,224	34,382	5,157
Virgin Islands	217,806	50,000	142,835	21,395	25,171	3,776
Bureau of Indian Affairs	322,801	.....	274,211	41,132	48,390	7,258

Administration of State Plan; obtaining assistance for State  
Advisory Council, evaluating and disseminating the program.

Information from U.S. Office of Education.



FY 1974 State Allotment	FY 1973 State Allotment	FY 1972 State Allotment	FY 1971 State Allotment	FY 1970 State Allotment	FY 1969 State Allotment	FY 1968 State Allotment	FY 1967 State Allotment	FY 1966 State Allotment
\$146,168,000	\$171,168,000*	\$146,248,000	\$143,243,000	\$118,393,000	\$184,876,000	\$187,876,000	\$135,000,000	\$75,000,000
41,782,960	166,204,128	141,860,560	138,945,710	112,901,210	169,929,720	183,329,766	131,707,317	73,600,000
2,449,468	2,875,336	2,506,858	2,478,544	2,040,343	2,927,740	3,424,841	2,483,073	1,384,922
539,182	575,925	539,810	528,498	483,700	547,744	452,588	377,273	285,286
1,425,888	1,831,294	1,415,188	1,395,872	1,143,854	1,816,112	1,861,908	1,226,009	729,875
1,483,809	1,700,020	1,539,539	1,506,599	1,268,288	1,713,497	1,936,210	1,418,521	847,491
12,858,831	15,026,435	12,519,028	12,194,851	9,881,939	14,182,781	16,449,441	11,804,104	5,996,364
1,870,727	1,922,730	1,823,996	1,581,788	1,302,880	1,744,119	1,974,878	1,447,782	854,131
2,119,208	2,479,508	2,087,884	2,054,831	1,881,122	2,333,908	2,675,143	1,987,827	1,088,743
681,038	744,786	667,311	689,101	597,711	715,180	858,430	521,739	362,298
4,337,343	5,122,313	4,198,174	4,037,886	3,182,148	4,530,189	5,245,834	3,741,378	2,004,323
3,186,026	3,730,575	3,238,686	3,150,285	2,519,142	3,625,930	4,223,564	3,023,851	1,863,178
809,352	897,508	829,122	821,878	716,722	874,776	868,244	661,975	438,234
787,531	871,536	794,149	781,230	689,438	858,908	848,919	655,429	448,524
7,241,045	8,578,342	7,188,477	7,087,572	5,660,541	8,223,596	9,585,795	6,738,178	3,809,491
3,558,086	4,194,830	3,512,220	3,445,850	2,786,361	3,980,987	4,624,411	3,306,175	1,823,414
2,028,533	2,363,489	2,040,799	1,978,800	1,648,450	2,292,489	2,689,953	1,933,483	1,128,420
1,864,413	1,915,213	1,733,252	1,699,825	1,422,144	1,942,094	2,213,590	1,613,184	943,203
2,268,436	2,659,868	2,293,271	2,246,048	1,849,465	2,822,880	3,071,780	2,215,481	1,272,427
2,843,852	3,106,455	2,714,843	2,659,379	2,150,754	3,074,988	3,551,093	2,551,891	1,409,927
938,488	1,051,208	928,497	921,749	804,617	1,031,142	1,078,491	816,550	530,937
2,729,393	3,208,507	2,841,007	2,580,858	2,088,229	2,955,184	3,397,502	2,444,096	1,336,701
3,740,901	4,412,418	3,805,884	3,554,775	2,887,343	4,152,189	4,835,193	3,453,108	1,916,781
6,026,892	7,133,239	5,998,883	5,857,883	4,891,787	6,801,512	7,885,320	5,593,773	2,976,979
2,707,542	3,182,500	2,657,851	2,597,893	2,087,802	2,976,706	3,470,810	2,496,405	1,399,113
1,726,834	1,989,271	1,822,205	1,786,735	1,502,449	2,072,827	2,388,011	1,735,808	1,020,711
3,146,843	3,704,172	3,159,124	3,072,094	2,481,771	3,576,532	4,126,703	2,955,870	1,833,843
778,286	880,509	776,115	772,938	668,277	857,882	851,854	657,249	443,556
1,228,975	1,396,949	1,220,788	1,205,811	1,024,798	1,355,131	1,501,013	1,113,087	689,815
638,079	693,856	629,593	613,086	551,066	648,828	684,322	489,728	327,909
782,786	865,889	771,838	765,832	665,545	815,216	794,988	617,585	412,894
4,887,547	5,539,131	4,862,810	4,548,731	3,826,822	5,248,181	6,078,982	4,326,020	2,326,985
1,002,483	1,127,375	1,013,903	989,211	890,486	1,112,240	1,184,497	890,347	553,287
11,317,079	12,429,700	11,386,728	11,192,431	8,899,461	12,267,867	15,598,196	11,005,483	5,331,022
3,446,821	4,061,212	3,536,034	3,472,478	2,787,844	4,011,337	4,705,504	3,362,088	1,853,854
231,658	306,035	234,888	228,287	183,528	215,806	266,364	175,544	105,588
7,043,833	8,343,736	7,101,900	6,993,555	5,520,394	8,124,450	9,489,272	6,719,472	3,897,474
1,833,574	2,116,552	1,839,415	1,804,001	1,496,021	2,039,599	2,341,821	1,702,828	1,009,140
1,574,982	1,808,748	1,548,998	1,508,393	1,287,496	1,723,476	1,931,407	1,415,150	825,258
7,533,983	8,927,001	7,487,161	7,413,108	5,928,233	8,707,724	10,293,043	7,283,581	3,943,399
885,353	987,966	876,911	868,830	751,529	950,875	986,799	738,160	488,782
1,933,956	2,242,480	2,011,043	1,971,261	1,634,142	2,247,084	2,603,012	1,886,501	1,100,805
759,238	837,861	760,750	752,838	670,038	839,155	833,672	644,729	446,048
2,885,524	3,156,294	2,733,901	2,681,550	2,179,882	3,110,281	3,647,737	2,619,719	1,472,890
7,439,733	8,814,826	7,539,555	7,332,848	5,817,974	8,478,187	9,893,210	7,002,968	3,720,782
1,018,080	1,145,940	1,023,941	1,004,543	886,965	1,113,987	1,186,174	877,386	553,474
614,620	665,736	608,797	600,498	543,726	637,800	662,285	454,247	337,187
3,155,554	3,715,731	3,188,394	3,108,857	2,498,188	3,581,329	4,175,918	2,990,411	1,852,988
2,373,199	2,784,560	2,361,858	2,291,835	1,854,696	2,506,213	2,888,747	2,072,580	1,201,226
1,368,140	1,562,586	1,400,437	1,399,228	1,188,348	1,615,011	1,840,104	1,351,071	827,281
3,087,703	3,634,974	2,971,457	2,918,823	2,364,521	3,404,272	3,960,810	2,839,442	1,583,119
552,486	591,782	550,842	543,345	501,223	580,075	504,989	414,036	317,541
780,407	839,253	807,189	801,772	705,509	874,098	857,785	661,852	440,713
188,128	195,979	189,597	185,915	177,863	193,475	144,389	85,364	50,999
262,424	286,036	254,023	249,510	227,203	262,626	206,899	124,526	71,623
3,144,654	3,781,210	3,151,235	3,076,948	2,411,335	3,848,997	4,484,140	2,112,353	1,236,217
282,758	310,681	209,836	208,845	195,733	221,850	184,514	97,952	58,323
210,427	223,007	280,555	277,859	249,198	293,943	235,112	140,882	82,838
296,649	338,127	302,195	298,113	230,458	325,588	331,210	204,524	00

\*Includes \$25 million in Impounded Funds